

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

<b>TOREY FITZGERALD, individually, and</b>	)	
<b>on behalf of all others similarly situated,</b>	)	<b>Civil Action No. 2:17-cv-02251</b>
	)	
<b>Plaintiff,</b>	)	
	)	<b>DISTRICT JUDGE MAYS</b>
<b>v.</b>	)	<b>MAGISTRATE JUDGE CLAXTON</b>
	)	
<b>P.L. MARKETING, INC.,</b>	)	
	)	<b>JURY DEMAND</b>
<b>Defendant.</b>	)	
	)	

---

**SUPPLEMENTAL DECLARATION OF C. ANDREW HEAD IN SUPPORT OF  
MOTION FOR FINAL SETTLEMENT APPROVAL AND AWARD OF FEES, COSTS,  
AND PAYMENTS**

1. My name is C. Andrew Head. I am over the age of eighteen and competent to testify to the matters set forth in this declaration. I make this declaration based on my own personal knowledge as the owner and managing shareholder of Head Law Firm, LLC, and as the lead counsel attorney for the Plaintiffs in the above-captioned matter.
2. This declaration supplements the previously filed Declaration of C. Andrew Head ("Head Decl.") [ECF 97-2], detailing the experience and expertise supporting the current hourly rates of Head Law Firm's attorneys as stated therein. Attorney Donna L. Johnson, formerly Of Counsel with the firm through 2017, also performed a limited amount of attorney services on this litigation matter. Ms. Johnson received her J.D. and M.B.A. from Georgia State University, and has been practicing law since her admission to the Georgia bar in 1999. Her hourly billing rate at the time of her departure in 2017 was \$325.
3. The attorneys at my firm worked a combined 606.3 hours on this case. The hours worked and hourly rates for each Head Law Firm, LLC attorney in this matter are as follows:

<u>Attorney</u>	<u>Hourly Rate</u>	<u>Hours</u>
C. Andrew Head	\$600	220.5
Bethany A. Hilbert	\$400	362.7
Donna L. Johnson	\$325	23.1

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2020.

/s/ C. Andrew Head

C. Andrew Head